

1 LIPSON NEILSON P.C.
 2 JOSEPH P. GARIN, ESQ.
 3 Nevada Bar No. 6653
 4 LISA J. ZASTROW, ESQ.
 5 Nevada Bar No. 9727
 6 9900 Covington Cross Drive, Suite 120
 7 Las Vegas, Nevada 89144
 8 Phone: (702) 382-1500
 9 Fax: (702) 382-1512
 10 jgarin@lipsonneilson.com
 11 lzastrow@lipsonneilson.com

12 *Attorneys for Defendants Nevada Charter Academies dba
 13 American Preparatory Academy – Las Vegas, Lee Iglody,
 14 Jonathan Gardner, Melissa St. Jean, Ernie Elliott, Candyce Farthing*

15
 16 **UNITED STATES DISTRICT COURT**
 17
 18 **FOR THE DISTRICT OF NEVADA**

19 * * *

20 AMERICAN PREPARATORY SCHOOLS,) Case No: 2:20-cv-01205-JAD-NJK
 21 INC., a Utah Corporation,)
 22)
 23 Plaintiff,) **STIPULATION AND ORDER**
 24 vs.) **EXTENDING TIME TO FILE**
 25) **RESPONSE TO PLAINTIFF'S**
 26) **COMPLAINT**
 27) **(Second Request)**

28 NEVADA CHARTER ACADEMIES d/b/a)
 29 AMERICAN PREPARATORY ACADEMY –)
 30 LAS VEGAS, a Nevada Corporation, LEE)
 31 IGLODY, an individual, JONATHAN)
 32 GARDNER, an individual, MELISSA ST.)
 33 JEAN, an individual, ERNIE ELLIOT, an)
 34 individual, and CANDYCE FARTHING, an)
 35 individual, RACHELLE HULET, an individual,)
 36)
 37 Defendants.)
 38 _____)

39 Defendants Nevada Charter Academies dba American Preparatory Academy – Las Vegas,
 40 Lee Iglody, Jonathan Gardner, Melissa St. Jean, Ernie Elliott, and Candyce Farthing (“Defendants”)
 41 and American Preparatory Schools, Inc. (“Plaintiff”), by and through their respective attorneys of
 42 record, HEREBY STIPULATE AND AGREE, that Defendants shall have through and including
 43 **July 29, 2020**, within which to file and serve a response to Plaintiff’s Complaint [ECF No. 1]. This
 44 Stipulation is made in accordance with LR IA 6-1 and LR 6-2, of the Local Rules of this Court.

LIPSON NEILSON P.C.

9900 Covington Cross Drive, Suite 120, Las Vegas, Nevada 89144
 Telephone: (702) 382-1500 Facsimile: (702) 382-1512

1 This is the second request for extension of time to file an answer or otherwise respond to Plaintiff's
2 Complaint from the original due date of July 16, 2020

3 The Court had earlier granted the parties' stipulation to an extension of time, up to and
4 including July 27, 2020, for all Defendants (including Defendant Rachelle Hulet) to file their Answer
5 or otherwise respond to Plaintiff's Complaint [ECF No. 26]. Pursuant to Local Rule IA 6-1(a), the
6 parties state the reason for the extension requested is that, with the fast moving space of the TRO
7 brefing, counsel for the Defendants need more time to properly respond to the Complaint, and will
8 need additional time of two (2) more days, up to and including July 29, 2020, to prepare responsive
9 pleading.

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11 Upon agreement by and between all the parties herein, the undersigned respectfully request this
12 Court grant another extension of time, up to and including **July 29, 2020**, for Defendants to file their
13 Answer or otherwise respond to Plaintiff's Complaint.

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1 The parties have entered into this Stipulation in good faith and not for purposes of delay.

2 DATED this 24th day of July, 2020
3 LIPSON NEILSON P.C.

4 /s/ Lisa J. Zastrow

5 JOSEPH P. GARIN, ESQ.
6 Nevada Bar No. 6653
7 LISA J. ZASTROW, ESQ.
8 Nevada Bar No. 9727
9 9900 Covington Cross Drive, Suite 120
10 Las Vegas, Nevada 89144
11 *Attorneys for Defendants Nevada Charter
12 Academies dba American Preparatory
13 Academy – Las Vegas, Lee Iglody, Jonathan
14 Gardner, Melissa St. Jean, Ernie Elliott,
15 Candyce Farthing*

16 DATED this 24th day of July, 2020.
17 TAKOS LAW GROUP, LTD.

18 /s/ Zachary P. Takos

19 ZACHARY P. TAKOS, ESQ.
20 Nevada Bar No. 11293
21 1980 Festival Plaza Drive, Suite 300
22 Las Vegas, NV 89135
23 *Attorneys for Plaintiff*

24 -and-

25 PARR BROWN GEE & LOVELESS

26 JONATHAN O. HAFEN, pro hac vice pending
27 CHAD S. PEHRSON, pro hac vice pending
28 STEPHEN C. MOURITSEN, pro hac vice
pending
101 South 200 East, Suite 700
Salt Lake City, UT 84111

29 *Attorneys for Plaintiff*

30 **ORDER**

31 IT IS SO ORDERED.

32 
33 UNITED STATES MAGISTRATE JUDGE

34 DATED: July 27, 2020